



United States Department of the Interior

NATIONAL PARK SERVICE
GRAND TETON NATIONAL PARK
P.O. BOX 170
MOOSE, WY 83012-0170



IN REPLY REFER TO:
10.B (GRTE)

JUL 11 2019

Wind River Aviation
Anthony Chambers
Post Office Box 3885
Jackson, WY 83001-3885

Dear Mr. Chambers:

Thank you for your email of May 16, 2019 requesting our perspective regarding Wind River Aviation's proposed helicopter flights out of the Jackson Hole Airport. For the reasons described in this letter, we oppose the proposal.

Grand Teton National Park and our neighbors are already significantly impacted by the noise and visual intrusion of aircraft associated with takeoffs and landings at the Jackson Hole Airport. As you know, the airport is the only commercial airport located completely within a national park, operating in accordance with the terms and conditions of a 1983 agreement between the Department of the Interior and the Jackson Hole Airport Board. Although the agreement contains significant limitations on noise and access, more than 28,000 operations (takeoff or landing) occur annually at the airport and result in well documented impacts on the park's natural soundscape and other resources and values. Under current federal law, there is very little, if any, opportunity to impose additional noise or access restrictions on the use of the airport, and forecasts indicate that the number of operations at the airport will continue to grow through the foreseeable future.

Grand Teton National Park collaborates with the Federal Aviation Administration to manage all commercial air tours taking place below 5,000 feet above ground level, over or within one-half mile of units of the National Park System. These type of tours are governed by the National Parks Air Tour Management Act of 2000 (NPATMA) as amended by the FAA Reauthorization Act of 2012.

NPATMA, as amended, requires all persons conducting commercial air tour operations over units of the National Park System apply to the Federal Aviation Administration (FAA) for authority to conduct such operations. NPATMA further requires that the Administrator of the FAA, in cooperation with the Director of the National Park Service (NPS), establish an Air Tour Management Plan (ATMP) for the affected park or parks if such a plan is not already in place at the time application is made to conduct commercial air tours.

However, as we understand your proposal, you do not intend to operate air tours over or within one-half mile of Grand Teton National Park. Nonetheless, I encourage you to look beyond the park's concerns in moving forward, as your actions have the potential to impact the nearby National Elk Refuge, national forests, the Jackson Hole Valley, and our neighbors.

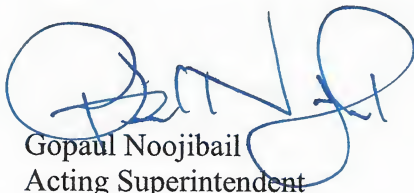
If you move forward with your application, I recommend that you apply the same criteria that would apply if your flights were subject to an ATMP. These include restrictions or requirements relating to routes, maximum or minimum altitudes, time-of-day, maximum number of flights, mitigation of noise, visual, and other impacts; and other factors described in NPATMA. We also encourage you to consult with the FAA on the latest noise reduction standards associated with helicopter use.

One provision of the 1983 agreement is that the Airport Board may not enter into any agreements or contracts that would allow for the origination of commercial scenic flights over noise sensitive areas of the park. The purpose of this provision is to ensure that the already significant impacts of the airport are not compounded by the addition of noise and visual intrusion from commercial scenic flights. Commercial air tours, regardless of where they originate, would unnecessarily exacerbate the already significant impacts associated with the use of the airport.

In addition, there are potential conflicts with fire or search-and-rescue operations conducted by NPS or other state and federal agencies. The NPS and the Bridger-Teton National Forest operate jointly out of our interagency helibase located at the Jackson Hole Airport. Missions occur almost every day during the summer operating season on both an emergency and nonemergency basis, including highly complex mountain rescue and short haul operations in the Teton Range and surrounding areas. The addition of commercial air tours into the airspace could compromise airspace safety.

For the reasons outlined in this letter, we oppose your project. Regardless, we encourage you to engage with any and all the community stakeholders if you move forward. Should you have any further questions, please feel free to contact Chief Ranger Michael Nash at (307) 739-3472.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gopaul Noojibail', is written over the printed name and title.

Gopaul Noojibail
Acting Superintendent
Grand Teton National Park
John D. Rockefeller, Jr. Memorial Parkway

cc: Jim Elwood/JAC